

DONNA L. SOTO, ADMINISTRATRIX)	SUPERIOR COURT
OF THE ESTATE OF VICTORIA L.)	
SOTO, DECEASED, ET AL.)	J.D. OF FAIRFIELD/BRIDGEPORT
)	@ BRIDGEPORT
v.)	
)	
BUSHMASTER FIREARMS)	
INTERNATIONAL, LLC, ET AL.)	December 11, 2015

**THE REMINGTON DEFENDANTS’
MOTION TO DISMISS PLAINTIFFS’ FIRST AMENDED COMPLAINT**

Defendants, Remington Arms Company, LLC and Remington Outdoor Company, Inc., (the “Remington Defendants”),¹ move to dismiss the plaintiffs’ First Amended Complaint pursuant to Practice Book § 10-30(a)(1). The First Amended Complaint should be dismissed for lack of subject matter jurisdiction. In particular, the Remington Defendants are immune from the Plaintiffs’ claims by virtue of the Protection of Lawful Commerce in Arms Act. 15 U.S.C. § 7901 *et seq.* (“PLCAA”), and the Plaintiffs lack standing to pursue a claim against the Remington Defendants for alleged violations of the Connecticut Unfair Trade Practices Act (“CUTPA”). The Remington Defendants incorporate by reference their Memorandum of Law in Support submitted herewith.

WHEREFORE, the Remington Defendants respectfully request that all claims against them, including Counts 1, 4, 7, 10, 13, 16, 19, 22, 25, 28, and 31 of Plaintiffs’ First Amended

¹ This motion is also submitted on behalf of Bushmaster Firearms International, LLC, Bushmaster Firearms, Inc., Freedom Group, Inc., Freedom Group, LLC, Freedom Group, LLC, Bushmaster Holdings, LLC, and Bushmaster Firearms Int., Inc., regardless of whether these entities actually exist.

Complaint, be dismissed.

THE DEFENDANTS,

REMINGTON ARMS CO., LLC and
REMINGTON OUTDOOR COMPANY, INC.

BY: /s/ Scott M. Harrington/#307196

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was mailed on December 11, 2015 to the following counsel:

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